FEDERAL BUREAU OF INVESTIGATION
FOI/PA
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FOI/PA# 1570161-000

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To: Houston From: Houston
Re: 92B-HO-31980, 07/18/1996

b7E

[redacted]

It is proposed that a supporting case be opened within JDIG, oriented toward, but not limited to, telephone call cross-checks and link analysis. It is proposed that IRS [redacted] assist in this effort.

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♦♦

(03/31/95)

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE Date: 07/18/1996

To: Houston

From: Houston
(DS-4 USCS)
Contact: SSA [redacted] b6 b7C b7E

Approved By: [redacted]

Drafted By: [redacted]

File Number(s) [redacted] (Pending) [redacted] Closed)

Title: STANFORD FINANCIAL GROUP

Synopsis: The STANFORD FINANCIAL GROUP and its subsidiaries operating in Houston, Miami and St. Johns, Antigua, have been linked to South American narcotics traffickers and the Comptroller of the Currency has identified suspicious transactions. Suspicious exportations of monetary instruments have also been documented.

Details: During 1991, two apparently unrelated sources of information reported alleged money laundering violations to the U.S. Customs Service, involving the STANFORD FINANCIAL GROUP. [redacted] b6 b7C of the group having subsidiaries in Houston, Miami and St. Johns, Antigua. It was determined that the FBI Houston was concurrently investigating similar allegations. These Customs and FBI investigations culminated in 1994, without substantiating the allegations. The FBI determined the following:

[redacted] b6 b7C

That the Comptroller of the Currency had identified a subsidiary as a suspicious account holder; and,

That [redacted] was the largest single customer of a subsidiary.

[redacted]

1

92B-HO-3198[illegible]-1

SEARCH [redacted]
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[redacted] EXED [redacted] ILED

JUL 22 1996

[redacted]

FEDERAL BUREAU OF INVESTIGATION
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DELETED PAGE INFORMATION SHEET
FOI/PA# 1570161-000

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Page 26 ~ b3; b6; b7C;
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(Rev. 05-01-2008)

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/23/2009

To: Washington Field **Attn:** SAC [redacted]

Houston SAC [redacted]

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From: Washington Field
Squad CR-20/NVRA
Contact: SA [redacted]

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 58C-WF-NEW (Pending) WF-240027-1
58C-HO-NEW (Pending
58C-WF-228974 (Pending)
58C-WF-234819 (Pending)
58C-WF-237029 (Pending)
58C-WF-238875 (Pending)
58C-WF-239565 (Pending)

Title: INTER-AMERICAN ECONOMIC COUNCIL;
STANFORD FINANCIAL GROUP;
CONGRESSMAN [redacted]
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN ET AL;
CFPO-LEGISLATIVE BRANCH
[redacted]

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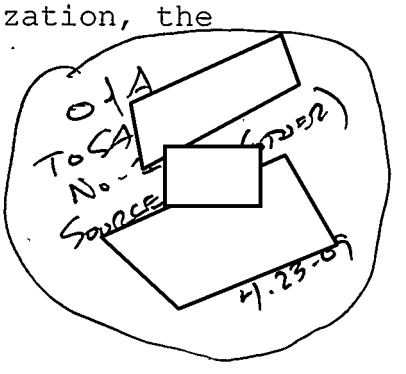
GRAND JURY MATERIAL - DISSEMINATE PURSUANT TO RULE 6(e)

Synopsis: Request for SAC and CDC authority to open a full field investigation to detect, obtain information about, and prevent or protect against federal public corruption crimes involving U.S. House of Representatives Members and Staffers, further identified below, who received lavish trips allegedly sponsored by corporate contributions through a pass-through non-profit organization, the



113 [redacted] 01. wpd

To: Washington Field From: Washington Field
Re: 58C-WF-NEW, 03/23/2009

Inter-American Economic Council. This matter is being initiated concurrently with the Houston Division given the connections between the Inter-American Economic Council and [redacted] subject of a Houston Division Corporate Securities Fraud case. b6 b7C

DIOG Compliance

These public corruption allegations involve Members and staffers of the U.S. House of Representatives, considered as "Domestic Public Officials" constituting a [redacted] as defined in the Domestic Investigations and Operations Guide (DIOG). The conduct surrounding these trips, on the part of Congressional members, non-profit employees, and corporate sponsors, are in possible violation of the new lobbying law known as the Honest Leadership and Open Government Act of 2007 ("HLOGA"), as well as various corruption statutes including the Honest Services Fraud statute (18 USC 1346) and the Bribery/Gratuities statute (18 USC 201). b7E

Additional investigation is necessary to determine the true source of funding for these trips, as well as to determine if the trips were provided to influence or reward legislative action as part of a corrupt pattern of conduct. Sponsors of these trips may have been disguised through the use of the non-profit organization. [redacted] b7E

[redacted]

Details:

Factual Allegations

Captioned matter is being initiated as a joint investigation of the Washington Field Office (WFO) and Houston Division (HO), to address allegations of unlawful provision of TOVs to current and former Members of Congress through the Inter-American Economic Council (IAEC) and by Stanford Financial Group (SFG). By way of background, these allegations came to the attention of WFO and Houston as a result of the FBI Houston Division and Securities and Exchange Commission (SEC) investigation of [redacted] and SFG. There has been, b6 b7C

and continues to be, substantial media coverage of the SFG matter which has revealed connections between [redacted] and Capitol Hill. [redacted] association with the IAEC is a central issue in the captioned investigation. The IAEC is a District of Columbia-based non-profit corporation, established in 1999, to "provide senior Government officials, leading business executives, and academic professionals the opportunity to engage in a dialogue about current and future economic strategies in the hemisphere". Although the IAEC's donors are not public, according to a press release on the IAEC's web site, dated 10/24/2005, the Council presented [redacted] while stating that [redacted] has "strongly supported" the IAEC.

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According to open source reporting, IAEC regularly sponsored trips for U.S. lawmakers to the Carribean. For instance, former Congressman [redacted] convicted and imprisoned as part of the [redacted] was a Chairman of the House Carribean Caucus and is alleged to have taken trips with [redacted] and spent time on [redacted] Some of these trips were conducted as Congressional Carribean Caucus events, including trips to Antigua (2005) and Jamaica (2006). [redacted] is known to have had extensive Carribean business interests including Stanford International Bank which was headquartered in Antigua. It's reasonable to assume that the support of key U.S. Congressmen/women, as well as that of the Congressional Carribean Caucus, was of great importance to [redacted] business interests. It has been reported that [redacted]

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Some of the Congressional attendees on the IAEC trip to Antigua in 2005 also attended recent trips to the Caribbean sponsored by the New York Carib News Foundation (NYCNF). The NYCNF is suspected of being used as a pass-through entity to fund lawmaker travel and is the current subject of WFO case 58C-WF-239565. Congressional Members who attended both the NYCNF and IAEC trips include Representative [redacted] Representative [redacted], and Representative [redacted] all of which have taken numerous, privately sponsored trips. According to a press release on the IAEC's web site, Representative [redacted] was identified as a [redacted] of the Caribbean Caucus and Representative [redacted] was also a Member. On the 2005 IAEC trip to Antigua, Congressional Members flew on the SFG corporate aircraft. It is unknown how often SFG's jets were used to fly Congressional

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To: Washington Field From: Washington Field
Re: 58C-WF-NEW, 03/23/2009

Members or staff on trips to the Caribbean or other locations. Provision of these trips must be accurately reported on Congressional Travel Disclosure Forms by House rule, and on Financial Disclosure Forms by law under penalties of 18 USC 1001.

In response to published media reports that connected SFG to Capitol Hill, WFO initiated a review [redacted]

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Legistorm's listing of privately sponsored travel indicates that IAEC sponsored numerous trips for lawmakers, including the trip to Antigua from 01/12/2005 to 01/16/2005. Individuals who attended that 2005 trip include Representative [redacted] former Representative [redacted] and [redacted] along with his staffer, [redacted] Each of these referenced WFO investigations concerns the acceptance of TOVs such as meals, event tickets, and trips, by Congressional Members or staff, in exchange for performance of Official Acts. WFO also discovered that Congressman [redacted] used [redacted] corporate jet for a return flight from Antigua to Wilmington, North Carolina, during a personal vacation. According to an article in *The Washington Post*, dated 02/19/2009, Congressman [redacted] used [redacted] private jet at least 14 times from 2003 to 2006, with other media outlets reporting that [redacted] used the SFG jet 16 times. An article in *The Frontrunner*, dated 05/10/2006, stated that [redacted] twice used [redacted] jets to make court appearances in Texas. WFO's review has identified travel of many other Members of Congress on SFG aircraft.

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[redacted]

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[redacted] b3 b6 b7C b7D b7E

SFG's lobbying efforts on Capitol Hill are extensive and reveal interesting connections. According to open source reporting, SFG significantly increased federal lobbying in 2008, but the purpose of the lobbying is noticeably vague on federal lobbying disclosures. According to 2008 lobbying disclosure forms, SFG in-house lobbying expenditures spiked by more than 300 percent, totaling $2.2 million. The lobbying purpose is listed as "general financial issues that might affect Stanford Financial Group." The two in-house lobbyists who registered in early 2008 were [redacted] In-house lobbying records for 2008 indicate [redacted] lobbied the House and Senate. SFG also paid the Ben Barnes Group $625,000 in 2008, according to lobbying disclosure records, for "economic development in the Caribbean, specifically the Virgin Islands."

The SFG lobbying effort has ties to [redacted] b6 b7C served as Representative [redacted] for many years, including from 2001 to 2006 when Representative [redacted] was [redacted] In January 2007, both [redacted] left Capitol Hill and joined the lobbying firm Baker Hostetler. According to Representative [redacted] biography on the Baker Hostetler web site, he is listed as a member of SFG's International Advisory Board. It is not yet known if this is a compensated position and when he became a Board Member. According to Representative's [redacted] annual financial disclosures for 2005 and 2006, there is no mention of his relationship with SFG. Open source reporting indicates Representative [redacted] used SFG's aircraft during his federal service.

In addition to the in-house lobbying shop, SFG also has a market-research firm, based in the District of Columbia, that provides political intelligence on market-moving legislation for clients (according an article in *The Hill*, dated 02/18/2009). The entity, formerly known as the Washington Research Group, is the Stanford Washington Research Group. Based on the trips received by Congressional Members and staff, all of these quasi-

To: Washington Field From: Washington Field
Re: 58C-WF-NEW, 03/23/2009

lobbying entities should be reviewed for possible illegal influence on Capitol Hill.

Department of Justice Opinion

On 03/09/2009, Department of Justice, Public Integrity Section, Trial Attorney [redacted] b5 b6 b7C

[redacted]

Questions concerning this matter should be directed to Supervisory Special Agent [redacted] Washington Field, [redacted] b6 b7C b7E

To: Washington Field From: Washington Field
Re: 58C-WF-NEW, 03/23/2009

LEAD(s):

Set Lead 1: (Info)

HOUSTON

AT HOUSTON, TX

Open and assign concurrent HO Division 58 Matter to be worked concurrently with WFO, CR20.

♦♦

(Rev. 05-01-2008)

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/08/2009

To: Criminal Investigative **Attn:** Public Corruption Unit

From: Washington Field
Squad CR-20/NVRA
Contact: SA [redacted]

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 58C-WF-240027 (Pending) - 2

Title: INTER-AMERICAN ECONOMIC COUNCIL;
STANFORD FINANCIAL GROUP;
CONGRESSMAN [redacted]
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN ET AL;
CFPO-LEGISLATIVE BRANCH
[redacted]

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Synopsis: Enclosed for the Public Corruption Unit are the original and one copy of an opening LHM.

Details: Captioned investigation addresses allegations of corrupt conduct on the part of Congressional Members and/or staff whom attended Inter-American Economic Council conferences in the Carribean and South America from 2004 to 2008. The IAEC conferences appeared to be significantly sponsored by Stanford Financial Group (SFG). Houston Division and the Department of Justice (DOJ) Fraud Section currently address a separate financial crimes matter on SFG and [redacted] including financial fraud at Stanford International Bank based in Antigua. Media coverage, past [redacted] and several pending public corruption matters at Washington Field Office (WFO) appear to support allegations that Members of Congress, family, or staff have received substantial things of value (TOVs) in violation of financial reporting requirements and in possible connection with acts to support SFG.

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UNCLASSIFIED

128[redacted]01.wpd

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To: Criminal Investigative From: Washington Field
Re: 58C-WF-240027, 05/08/2009

Captioned matter will also examine whether this non-profit (IAEC) was used as a pass-through and address allegations that Members were aware of this arrangement.

Details concerning this matter are provided in the enclosed LHM which is suitable for appropriate dissemination within DOJ.

♦♦

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No. 58A-WF-240027

Manassas, VA 20109
May 8, 2009

INTER-AMERICAN ECONOMIC COUNCIL;
STANFORD FINANCIAL GROUP;
CONGRESSMAN [redacted]
CONGRESSMAN [redacted]
CONGRESSMAN [redacted]
CONGRESSMAN [redacted]
CONGRESSMAN [redacted] ET AL;
CFPO-LEGISLATIVE BRANCH
[redacted]

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Captioned matter is being initiated as a joint investigation by the Washington Field Office (WFO) and Houston Division to address allegations of unlawful provision of things of value (TOVs) to current and former Members of Congress through the Inter-American Economic Council (IAEC) and by Stanford Financial Group (SFG). These allegations came to the attention of WFO and Houston as a result of Houston Division and Securities and Exchange Commission (SEC) investigation of [redacted] and SFG. [redacted] support of the IAEC is a central issue in the captioned investigation. IAEC is a District of Columbia-based non-profit corporation, established in 1999, to "provide senior Government officials, leading business executives, and academic professionals the opportunity to engage in a dialogue about current and future economic strategies in the hemisphere".

IAEC regularly sponsored trips for U.S. lawmakers to the Carribean. Former Congressman [redacted] case, was a [redacted] the House Carribean Caucus and is alleged to have taken trips with [redacted] and spent time on [redacted] Some of these trips were conducted as Congressional Carribean Caucus events, including trips to Antigua (2005) and Jamaica (2006). [redacted] is known to have extensive Carribean business interests, including Stanford International Bank, which is headquartered in Antigua.

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Some of the Congressional attendees on the IAEC trip to Antigua in 2005 also attended recent trips to the Caribbean sponsored by the New York Carib News Foundation (NYCNF). The NYCNF is suspected of being used as a pass-through entity to fund lawmaker travel and is the current subject of a separate WFO case. Congressional Members who attended both the NYCNF

and IAEC trips include Representative [redacted] (D-Virgin Islands). Representative [redacted] and Representative [redacted], all of whom have taken numerous, privately sponsored trips. On at least the 2005 IAEC trip to Antigua, Congressional Members flew on the SFG corporate aircraft. b6 b7C

WFO review of information in the [redacted]

[redacted] b6 b7C b7E

Reporting indicates that IAEC sponsored numerous trips for lawmakers with attendees such as Representative [redacted] former Representative [redacted] Representative [redacted] and Representative [redacted] along with their staffers. WFO also discovered that Congressman [redacted] used [redacted] corporate jet for a return flight from Antigua to Wilmington, North Carolina, during a personal vacation. According to media articles, former Congressman [redacted] used [redacted] private jet approximately 14 to 16 times from 2003 to 2006. b6 b7C

[redacted] b6 b7C b7D b7E

SFG's lobbying efforts on Capitol Hill are extensive and lobbying expenditures spiked by more than 300 percent in 2008, totaling $2.2 million. The two in-house lobbyists who registered in early 2008 were [redacted] b6 b7C

[redacted] SFG also paid the Ben Barnes Group $625,000 in 2008 for "economic development in the Caribbean, specifically the Virgin Islands." SFG lobbying has ties to [redacted] served as Representative [redacted] for many years, including from 2001 to 2006 when Representative [redacted] The SFG also has a market-research firm, the Stanford Washington Research Group, that provides political intelligence on market-moving legislation for clients. Based on the trips received by Congressional Members and staff, all of these quasi-lobbying entities will be reviewed for possible illegal influence on Capitol Hill.

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Department of Justice Opinion

Department of Justice, Public Integrity Section [redacted]

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(Rev. 05-01-2008)

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/08/2009

To: Washington Field

From: Washington Field
Squad CR-20/NVRA
Contact: SA [redacted]

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 58C-WF-240027 (Pending) -4

Title: INTER-AMERICAN ECONOMIC COUNCIL;
STANFORD FINANCIAL GROUP;
CONGRESSMAN [redacted]
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN ET AL;
CFPO-LEGISLATIVE BRANCH
[redacted]

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Synopsis: Update to file re captioned matter. Document coordination between Washington Field Office (WFO), Houston Division and Department of Justice, Public Integrity Section (DOJ-PIN).

Details: The purpose of this communication is to document to the file CR20's coordination efforts re captioned matter with Houston Division and Department of Justice, Public Integrity Section. By way of background, the matter was proposed for WFO opening in early March 2009 and the matter was initiated on 04/23/2009.

On 03/19/2009, writer and Intelligence Analyst [redacted] met with DOJ-PIN attorneys [redacted]

[redacted]

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- [redacted]
- [redacted]
- [redacted]

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On 04/03/2009, the proposed investigative steps (as outlined above) were forwarded to Houston Division in advance of a conference call between Houston and CR20.

On 04/13/2009, writer contacted [redacted] DOJ-PIN, regarding proposed captioned matter to update the status of coordination with Houston and review of existing [redacted] materials.

On 04/21/2009, writer and CR20 Supervisor Special Agent (SSA) [redacted] completed a conference call with Houston SSA [redacted] and Special Agent (SA) [redacted] SA [redacted] was identified to CR20 as Houston FBI's proposed case agent on public corruption matters related to SFG. At that time, Houston did not have a pending PC matter.

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To: Criminal Investigative From: Washington Field
Re: 58C-WF-240027, 05/08/2009

On 04/24/2009, writer transmitted an e-mail to SA [redacted] concerning IAEC materials in the possession of CR20 and provided him with other POCs at DOJ-PIN and on CR20. Writer requested that SA [redacted] ID the applicable employees in Houston for inclusion on required 6E lists and indicated to Houston that WFO would transmit one complete copy of the one IAEC bulky evidence item for their review. Also on 04/24/2009, writer requested DOJ-PIN seek additional query of names and terms over CT evidence given the prior statements of several [redacted]

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♦♦

FD-302 (Rev. 10-6-95)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 07/31/2009

GRAND JURY MATERIAL - DISSEMINATE PURSUANT TO RULE 6(e)

The below listed Special Agent (SA) of the FEDERAL BUREAU OF INVESTIGATION (FBI) [redacted]

[redacted] b3 b6 b7C

[redacted] b3

One copy of the original Federal Grand Jury subpoena is attached hereto and incorporated herein for reference.

Investigation on 07/29/2009 at Manassas, VA

File # 58C-WF-240027-5

Date dictated

by SA [redacted] b6 b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency;

212 [redacted] 03.wpd

CO 293 (Rev. 8/91) Subpoena to Testify before Grand Jury

United States District Court

FOR THE **DISTRICT OF** COLUMBIA

TO:

SUBPOENA TO TESTIFY BEFORE GRAND JURY

SUBPOENA FOR:

YOU ARE HEREBY COMMANDED to appear and testify before the Grand Jury of the United States District Court at the place, date, and time specified below.

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b7C

PLACE	COURTROOM
UNITED STATES DISTRICT COURT **FOR THE DISTRICT OF COLUMBIA** **United States Courthouse** **Third & Constitution, NW** **Washington, DC 20001**	3rd Floor GRAND JURY ROOMS
	DATE AND TIME

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):

☐ *Please see additional information on reverse.*

This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

U.S. MAGISTRATE JUDGE OR CLERK OF COURT
NANCY MAYER-WHITTINGTON

(By) Deputy Clerk

DATE: June 15, 2009

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b7C

NAME, ADDRESS AND PHONE NUMBER OF ASSISTANT U.S. ATTORNEY

Trial Attorney
United States Department of Justice
Public Integrity Section, Criminal Division
1400 New York Avenue, NW
Washington, DC 20005

* If not applicable, enter "none".

FD-302 (Rev. 10-6-95)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 08/31/2009

The below listed Special Agent (SA) of the FEDERAL BUREAU OF INVESTIGATION (FBI) received one compact disc (CD) from the DEPARTMENT OF JUSTICE, PUBLIC INTEGRITY SECTION, concerning [redacted] and [redacted] (SFG). [redacted]

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Investigation on 08/27/2009 at Manassas, VA

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File # 58C-WF-240027 -Cp

Date dictated

by SA [redacted]

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency;

243 [redacted] 02.wpd

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 09/29/2009

[redacted] date of birth [redacted] Social Security Account Number [redacted] telephone number [redacted] was telephonically interviewed regarding ANTIGUA and [redacted] has been self-employed as a political consultant for the past eight years and currently works in Arizona. Throughout the interview, reference was made to an internet news articled, titled "Antigua and Barbuda: [redacted] First Major Victim - Half Moon Bay Hotel, Antigua?", by [redacted] dated July 20, 2009. After being advised of the identity of the interviewing Special Agent (SA) and nature of the interview, [redacted] thereafter provided the following information:

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The [redacted] had ownership interest in a resort hotel property located in ANTIGUA. The property, known as the HALF MOON BAY HOTEL, is located on prime beachfront in ANTIGUA. The property was acquired in 1971 and the ownership group initially included numerous investors, including [redacted] currently resides in ANTIGUA. The property was operated by a management firm that was hired by the owners.

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In 1995, the property was severely damaged by Hurricane Luis. The owners, at that time, determined that the property was largely under-insured. The ownership group, including the [redacted] began efforts to raise the necessary financing to restore and reopen the resort. [redacted] (hereafter referred to as [redacted] focused his efforts after September 1996 to refinancing the property.

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The process of obtaining foreign investment in ANTIGUA property can be a long process and requires a statement of support from the ANTIGUA government to support the lender's investment. This support can include a statement of finance or a "letter of comfort". Initially, the ownership group obtained refinancing on five or six separate occasions in which the process proceeded to the point that the government of ANTIGUA needed to provide a response to the lender for the process to be complete. In each case, the government failed to respond and the financing

Investigation on 09/25/2009 at Manassas, VA (telephonically)

File # 58C-WF-240027-7 Date dictated

by SA [redacted]

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arrangement fell through, requiring the ownership group to restart the refinancing process each time.

The island of ANTIGUA is small, approximately 70,000 residents. As such, rumors are persistent and often true. Early on in the refinancing efforts, it became apparent that there were efforts on the part of the government of ANTIGUA to block the [redacted] efforts to refinance the property, make repairs, and reopen the resort. Initial discussions between the ownership group and the government of ANTIGUA resulted in government efforts to convince the [redacted] to sell the property to another investor. The [redacted] ownership group persisted in their intent to gain financing and reopen the property. b6 b7C

As the ownership group began their last efforts to refinance the property in December 1999 and early 2000, rumors began to surface that the government of ANTIGUA was moving to "nationalize" the property using eminent domain. Additionally, it became known to the [redacted] that the government was supporting efforts to transfer the property to [redacted] As part of their final efforts to gain financing, the [redacted] ownership group used a public relations campaign to make sure ANTIGUA residents were aware that their group obtained financing and were waiting on government action. They sent press releases to the two main newspapers covering ANTIGUA. [redacted] also visited various Member of Congress on Capitol Hill, making those members aware of the family's past efforts and frustrations. Some of those Members wrote letters to the government of ANTIGUA and the U.S. STATE DEPARTMENT. b6 b7C

The government of ANTIGUA responded to the efforts by offering the ownership group a six month window to resolve the financing efforts or give up rights to the property. The [redacted] group rejected the offer in light of previous attempts by the government to ignore lender time lines. By late 2001, the lender requested a "letter of comfort" from the government which was not provided. It became more clear to the ownership group that the government was intent on transferring ownership of the property to [redacted]

At around the same time frame of their last efforts to refinance, the [redacted] became aware that JACK NICKLAUS GOLF (JNG) was being shown the property for a proposed redevelopment of the golf course on the property. At the time the property was shown to JNG, the property was still owned by the [redacted] ownership b6 b7C

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group. [redacted] contacted JNG, both in writing and telephone, and verified that [redacted] personnel were brought to the resort property by [redacted] personnel. [redacted] spoke with [redacted] at JNG. [redacted] maintains the documentation for his communication with JNG.

Refinancing efforts continued to stall and repeated problems with obtaining necessary support from the government eventually resulted in the [redacted] group pursuing legal remedy through the courts in London. In 2007, the Law Lords determined that the government could exercise eminent domain over the property and the government took possession of the property in 2008 with the requirement that fair compensation be made to the owners as required. The 2008 transfer also coincided with additional public efforts to allow [redacted] to redevelop the property. The [redacted] group is now awaiting the court's decision on the final compensation amount and may appeal the decision if necessary.

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The influence of [redacted] on the government of ANTIGUA, as related to the HALF MOON BAY project, was facilitated by the small size of the government. Many ANTIGUA officials "wore several different hats". Influence during the time period in question involved the ruling party of [redacted] and was described by [redacted] as including anyone in the [redacted] However, the later defeat of the [redacted] administration by the opposition party did not help the [redacted] situation as the newly appointed Attorney General was an attorney from ANTIGUA who once represented parties against the [redacted] ownership group in a lawsuit.

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During the refinance efforts, the [redacted] group became familiar with staff at the U.S. Embassy in Barbados. Over a period of time, one particular Embassy employee expressed concern that [redacted] was exerting influence over not only ANTIGUA government operations but also U.S. Embassy operations in the country of ANTIGUA. [redacted] maintains contact with this State Department employee, now located in the United States, and believes this employee has information of value regarding improper influence of [redacted] on U.S. diplomatic relations in ANTIGUA. The State Department employee is reluctant to voluntarily report these activities for fear of internal repercussions and has so far requested anonymity. However, [redacted] believes the employee would be willing to discuss this matter with the FBI if compelled to do so during an investigation. [redacted] will discuss this prospect with the employee and will facilitate the contact between the FBI and the employee if requested at a later date.

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The "Carribean Caucus", comprised of Members of Congress, was established between the first and second phase ANTIGUA efforts to nationalize the HALF MOON BAY property. [redacted] is aware of the Congressional Delegation visits to ANTIGUA, facilitated by [redacted] and believed those visits were viewed negatively by ANTIGUA residents. The perception was based on the apparent luxury of that travel, such as using [redacted] aircraft.

[redacted] also exerted influence over the ANTIGUA airport and at least one sea shipping terminal. The government allowed [redacted] to manage the airport and maintain a separate facility for his airline. The cargo port, on the west side of the island, was also managed and operated by [redacted] The rumor persisted on the island that [redacted] control of the sea and air terminals on the island somehow supported his efforts to establish a casino on the island. According to [redacted] the casino would then be used to "launder" financial proceeds from his ventures since there would be no way to verify the identity of those persons coming and going from the hotel.

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Substantial records concerning the [redacted] ownership group efforts are located in ANTIGUA at the residence of his [redacted] Additional materials are also available in New York at [redacted] residence. [redacted] believed that substantial detail, and documentation, could be provided by [redacted] given her role and location during this process.

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The above referenced internet article, written by [redacted] was one in a series of investigative articles written on [redacted] and ANTIGUA. The [redacted] ownership group provided many of the facts detailed in those articles. [redacted] can be contacted at the electronic mail address of [redacted]

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A copy of the referenced internet news article by [redacted] and the original interview notes have been enclosed in a FD-340 envelope for storage in the case file. Additionally, one copy of the news article is attached to this FD-302 for reference.

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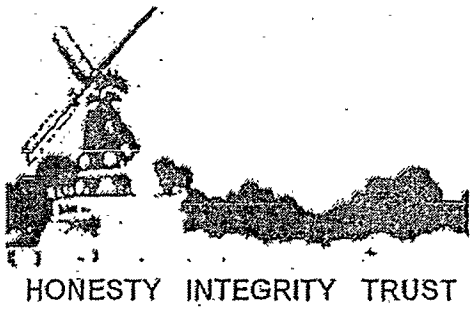

Antigua and Barbuda: Stanford's First Major Victim - Half Moon Bay Hotel, Antigua?

20 July 2009

Article by Ian Moncrief-Scott

Immediately after Hurricane Luis devastated the prestigious Half Moon Bay Hotel in 1995, the then Prime Minister Lester Bird spoke to its owners offering to broker a sale of their property to R. Allen Stanford, and urging them to accept this proposal.

When the owners declined and, for several years thereafter, the Government took every possible step to block the owners' ability to finance the redevelopment their property. When the owners finally overcame the hurdles set up by the Government, Lester Bird went to Parliament for a Declaration granting the Government power of eminent domain to take the property from the owners by force.

All in all, the Government made three separate attempts to expropriate the property and made no secret of the fact that it intended to transfer title to Stanford to develop. This was broadcast simultaneously with "loans" made by Stanford to the Government and with "loans forgiven."

Although he refused to communicate with the owners of Half Moon Bay directly, Stanford never disguised his interest in having the Government provide him with the property. He presented development plans to Cabinet and hired Nicklaus Golf architects to redesign the Half Moon Bay Golf Course. In an interview with the Wall Street Journal, he confirmed his interest and the Government's right to proceed under the empowerment of eminent domain.

The owners fought this transfer in the Courts of Antigua with the help of the Opposition party, the UPP. Baldwin Spencer, now current Prime Minister, swore an Affidavit in support of the owners request for a Judicial Review, stating that the expropriation was misguided, improper and against the interest of the people of Antigua.

He stated publicly that if and when his party came to power, the Parliamentary decision to forcibly acquire Half Moon Bay Resort would be reversed. Unfortunately, once in power, Spencer surrounded himself with Ministers who had their own agendas and personal interests in transferring the property to Stanford.

By 2004, Antigua owed Stanford EC$230 million, according to its Errol Cort's budget speech. He also announced that Stanford had agreed to write off EC$50 million of the debt, create a EC$10 million fund to support small businesses, donate EC$1 million to build a national library and build a EC$25 million higher education complex. (It should be noted that much of the projects were never funded in full or at all.)

In turn, Antigua, gave what Cort called a "green light" to Stanford to proceed with his plans for various developments on Antigua. Prime Minister Spencer announced his administration's "new alliance" with Stanford the philanthropist and boldly staked his political future on its success.

Meanwhile, Half Moon Bay Hotel's owners were forced to take their matter up to the Privy Council in London.

In June of 2007, twelve years after the struggle began, the Law Lords decided that the Government could exercise eminent domain under the laws of Antigua, PROVIDED the owners' constitutional right to "fair compensation within a reasonable time" be honoured.

The Government took physical possession of the property in July 2008. Several months later, the media announced that Stanford was to make a presentation to a Cabinet Committee of his "vision" for several projects on Antigua, and specifically the development of Half Moon Bay.

The Government's position stated in press interviews and published in press releases is that it does not intend to spend a penny on the transfer of the property from the owners to the new developer of choice.

This conflicts with the laws governing the process of eminent domain, which make no mention of any third party outside the Government that takes and the individuals who are paid by that same Government for the loss of their property. This is clearly stated by the Constitution of Antigua and Barbuda, as well as by the Antiguan Land Acquisition Act.

Nevertheless, almost a year after the Government took possession of the property, the owners had to take the Government back to court, merely to commence a dialogue on compensation, Following an order of mandamus, a Board of Assessment has been convened as prescribed by the Land Acquisition Act. Now, some ten months later, that Board is yet to hold a hearing and the owners have returned to the High Court seeking further orders to compel the Attorney General's compliance with the process.

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The interest that R. Allen Stanford had in owning the Half Moon Bay Resort and the Antiguan Government's desire to fulfil his wish have always been the clear cause and goal of the expropriation of this property. Now, with Stanford no longer in the picture, the Government of Antigua is between a rock and a hard place, while the owners of Half Moon Bay can claim the unenviable title of early major victims of Stanford's manipulations.

Meanwhile, by expropriating a property owned by U.S. citizens, the Government of Antigua has breached several international treaties and specifically the Caribbean Basin Initiative. By refusing to deal with compensation for the "forced acquisition," Antigua is now abandoning the last remedy it may have for any international redemption.

This clearly does not concern the Antiguan authorities. As seen in recent weeks, the Government of Antigua has increased its appetite for breach of international covenants and standards of best practise by expropriating Stanford's own properties.

Ironically following the pattern set by its expropriation of Half Moon Bay and jumping over the same initial steps prescribed by its Land Acquisition Act, Antigua's Attorney General Justin Simon applied to Parliament for authority to seize approximately 240 acres of property held by R. Allen Stanford and his group of companies, claiming this action was necessary to prevent their seizure by U.S. courts and court-appointed Receiver.

Wendy Gordon, a spokeswoman for Prime Minister Baldwin Spencer, said the move was intended to preserve 800 jobs.

On 26 February Spencer himself announced, "We have done something historical and unprecedented."

Days later the process of expropriation of Stanford-owned property was halted. The U.S.-appointed Receiver for all Stanford interests, with the weight of the American Government behind him, stopped the process. Simon spun this locally as suddenly becoming "cognisant of his responsibilities to U.S. authorities."

The Financial Authorities also took over the Stanford-owned Bank of Antigua and handed it to a newly created inter-Caribbean private financial entity of which the Government of Antigua is the largest single shareholder.

As observers watch to see whether the international authorities and regulators approve these actions or choose to interpret them as accessory to money laundering, frustration of creditors' rights and benefiting from the proceeds of crime, there can be no doubt that Antigua has confirmed its dismissive attitude towards international treaties, financial regulations and best practise.

The content of this article is intended to provide a general guide to the subject matter. Specialist advice should be sought about your specific circumstances.

Specific Questions relating to this article should be addressed directly to the author.

Do you have a question for the author?

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Eastern Caribbean Regulators - Are They Up To The Job - Update? (Information Management Solutions)
Antigua's Director of Gaming, Kaye McDonald has announced that Leroy King, longstanding CEO of the Financial Services Regulatory Commission has been sent on 55 days leave following the collapse of Stanford's global empire.

Exchange Traded Funds And The UCITS Framework (Dillon Eustace)
An Exchange Traded Fund ("ETF") is an investment vehicle that, in its typical form, is designed to enable investors to track a particular index through a single liquid instrument that can be purchased or sold on a stock exchange.

A Case For Domestic Hedge Funds In India? (Harneys)
A few months back, I had the opportunity to read V.Umakanth's working paper on hedge fund regulation in India(available on Mondaq and Hedge Fund Law Review).

FAQs: Channel Islands Stock Exchange - Debt Listing (Ogier)
Ogier Corporate Finance Limited ('OCFL') is the marketleader in providing listing agent services for the listing ofdebt securities on the Channel Islands Stock Exchange('CISX' or the 'Exchange') having sponsored over 350listings.

Securities Finance: An Overview Of The Legal Framework In Cyprus (Patrikios Pavlou & Co)
The Cyprus Securities and Exchange Commission is the regulatory authority that is primarily responsible for the administration and enforcement of Cyprus securities laws and therefore approves the prospectuses including the consistency of the information given and its comprehensibility.

Structured Finance - Representative Transactions (Ogier)
Phenix CFO Limited - Acted as Jersey legal adviser to IXIS-CIB on the issue of €180,000,000 multi-class notes pursuant to a CFO transaction structured using a Jersey issuer.

Murder On Antigua (Information Management Solutions)
Sadly, the tragic death of two young people, who had chosen Antigua as their honeymoon destination and who were murdered in their luxury hotel room during the early morning hours of July 29th comes as no surprise to those who have witnessed the decline of Antigua over the last decade.

Commercial Update - February 2009 (Dickinson Cruickshank)
Most jurisdictions have by now felt the effects of the credit crunch to a certain degree and are having to make adjustments to protect themselves and their businesses from its effects.

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FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/10/2009

To: Washington Field

From: Washington Field
Squad CR-20/NVRA
Contact: SA [redacted]

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 58C-WF-240027-O (Pending)

Title: INTER-AMERICAN ECONOMIC COUNCIL;
STANFORD FINANCIAL GROUP;
CONGRESSMAN [redacted]
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN ET AL;
CFPO-LEGISLATIVE BRANCH
[redacted]

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Synopsis: Update to file re captioned matter. Document coordination between Washington Field Office (WFO) and Department of Justice, Public Integrity and Fraud Sections (DOJ-PIN and DOJ-Fraud).

Details: The purpose of this communication is to document to the file CR20's coordination efforts re captioned matter with Houston Division and two sections of the Department of Justice (Public Integrity and Fraud). By way of background, matter was initiated on 04/23/2009 to examine the relationship between Stanford Financial Group (SFG), several Members of Congress and non-profits such at the Inter-American Economic Council (IAEC).

On 12/07/2009, writer met with Postal Inspector (PI) [redacted] Postal Inspection Service, Washington, DC. PI [redacted] is assigned to the SFG investigation based in the Fraud Section at DOJ. The SFG matter is also addressed by FBI Houston. Through DOJ-PIN, writer and assigned DOJ-PIN Trial Attorney [redacted] have been granted access to the SFG investigation on-line database. This access was granted in approximately

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November 2009 and represents WFO and DOJ-PIN's first access to SFG-related materials to further WFO's review of [redacted] relationship with several Members of Congress. The collection, according to PI [redacted] represents million of documents collected by the investigating agencies in this matter, including the Securities and Exchange Commission (SEC) civil matter which preceded the FBI's criminal investigation. PI [redacted] provided writer with an overview of the database's use to facilitate the review of relevant SFG materials. To date, this access compliments the IAEC materials in the possession of WFO. b6 b7C

PI [redacted] provided an overview of [redacted] b3 b6 b7C

[redacted]

Writer also discussed WFO's recent interview of [redacted] regarding the Half Moon Bay resort property in Antigua. This property was owned by the [redacted] and was heavily damaged by a hurricane in 1995. The ensuing years saw the family try, unsuccessfully, to rebuild and reopen the resort. The longstanding allegation held by the [redacted] was that [redacted] influenced the government of b6 b7C

To: Criminal Investigative From: Washington Field
Re: 58C-WF-240027, 12/10/2009

Antigua and/or members of the U.S. State Department to eventually have the property seized from them through eminent domain and turned over to SFG control. [redacted] referenced a potential State Department employee who may be able to provide information on this corrupt relationship. While this information would be of limited value to WFO's matter, PI [redacted] indicated that the main SFG investigation may benefit from the information in the 404B context. As such, writer will provide the [redacted] information to Houston and notify PI [redacted] of the same. b6 b7C

To date, instant matter remains focused on [redacted] relationship with captioned Members and staff, often utilizing the IAEC as a non-profit funding mechanism for CODELS. Most of the trips were in conjunction with the House's Caribbean Caucus. Considering available investigative areas, the following investigative steps are anticipated:

- [redacted] b3 b7D b7E

Writer anticipates database and IAEC materials review completion within the next investigative quarter with followup interviews of CWs thereafter.

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(Rev. 05-01-2008)

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FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 12/23/2009

To: Houston **Attn:** Squad CR-5
SSA [redacted]

From: Washington Field
Squad CR-20/NVRA
Contact: SA [redacted]

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 58C-WF-240027-9 (Pending)

Title: INTER-AMERICAN ECONOMIC COUNCIL;
STANFORD FINANCIAL GROUP;
CONGRESSMAN [redacted]
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN ET AL;
CFPO-LEGISLATIVE BRANCH
[redacted]

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Synopsis: Washington Field Office (WFO) refers potential lead information to Houston regarding [redacted] and Stanford Financial Group. Instant information may be relevant to pending Houston matter 318B-HO-68445.

Reference: 58C-WF-240027 Serial 7

Administrative: Reference two electronic-mail communications from Washington Field Office Supervisory Special Agent (SSA) [redacted] and Special Agent (SA) [redacted] to Houston Division SSA [redacted] on 10/26/2009 and 11/12/2009 respectively re captioned matter.

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Enclosure(s): Enclosed for Houston is one copy of a four-page FD-302 (plus two-page attachment), dated 09/25/2009, re interview of [redacted]

Details: The purpose of this communication is to refer Stanford Financial Group (SFG) related content to Houston for any action

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deemed necessary. WFO is aware that Houston is currently addressing an expansive criminal matter against Stanford Financial Group and [redacted] under matter 318B-HO-68445. b6 b7C

By way of background, captioned WFO PC matter was initiated on 04/23/2009 to specifically examine the relationship between Stanford Financial Group (SFG), several Members of Congress already covered by WFO investigation, and non-profits such as the Washington, DC-based Inter-American Economic Council (IAEC). Early investigation relied on IAEC materials already in the possession of WFO as a result of their collection during the investigation of Congressman [redacted] as part of [redacted] WFO has since acquired additional materials from IAEC and remains engaged in their analysis. Initial review also revealed [redacted] to be able to provide information on the relationship between IAEC and several Members of Congress. At case initiation, all captioned Members were already predicated for full field investigation under other cases, either the RM matter or separate full field investigations on WFO's CR20.

Captioned matter remains focused on IAEC's relationship with Members and staff, often utilizing SFG as a non-profit funding source for Congressional Delegations (CODELs) to the Caribbean. Most of the trips were in conjunction with the House's Caribbean Caucus. Matter has been closely coordinated with Department of Justice, Public Integrity Section (DOJ-PIN), and has relied on anticipated access of available SFG-related materials. As such, WFO's investigative progress has been limited until that access was gained. Coordination at DOJ includes ongoing discussions between DOJ-PIN and DOJ's Fraud Section.

In mid-2009, WFO was contacted by a previous [redacted] and referred to [redacted] was telephonically interviewed by WFO in late September 2009 regarding the Half Moon Bay Hotel in Antigua. In summary, [redacted] indicated that the Half Moon Bay property was owned by the [redacted] and was heavily damaged by a hurricane in 1995. The ensuing years saw the family try, unsuccessfully, to rebuild and reopen the resort. The [redacted] believes they have information that suggests that [redacted] influenced the government of Antigua and/or members of the U.S. b6 b7C b7E

To: Houston From: Washington Field
Re: 58C-WF-240027, 12/23/2009

State Department to eventually have the property seized from them through eminent domain and turned over to SFG control. This interview FD-302 is enclosed with this communication for Houston consideration.

During WFO interview, [redacted] also referenced a potential U.S. State Department employee who may be able to provide information on a corrupt relationship between [redacted] and the government of Antigua. [redacted] offered to introduce investigators to the State Department employee who he believed would have substantial information for investigators. [redacted] indicated the employee, currently state-side and still working for State, was reluctant to volunteer information due to current employment but would comply with a requested interview by the FBI. b6 b7C

By late November 2009, WFO (writer) and DOJ-PIN were granted access to the existing online database of materials related to the overall SFG matter. On 12/07/2009, writer met with Postal Inspector (PI) [redacted] Postal Inspection Service, who is assigned to the SFG matter and based at DOJ Fraud. While PI [redacted] provided an overview of the SFG database, writer also mentioned the interview of [redacted] PI [redacted] opined that such information regarding SFG and Half Moon Bay Hotel was consistent with known issues in the overall SFG matter and may be of significant value to the current SFG matter addressed by Houston. b6 b7C

Based on the foregoing, and that the information disclosed by [redacted] is less relevant to WFO's PC case, the information concerning [redacted] is being forwarded to Houston Division for action deemed necessary. WFO will re-contact [redacted] once more and inform him that this matter was referred to Houston Division. WFO specifically requests Houston notify WFO CR20 if Houston will not contact [redacted] for further investigation regarding his allegations re SFG and Antigua. This is in light of CR20's relationship with the government witness who initially referred WFO to [redacted] b6 b7C

Questions regarding this matter can be directed to SA [redacted] Northern Virginia RA, a [redacted] b6 b7C b7E

To: Houston From: Washington Field
Re: 58C-WF-240027, 12/23/2009

LEAD(s):

Set Lead 1: (Discretionary)

HOUSTON

AT HOUSTON, TEXAS

For action deemed necessary by Houston, Washington Field Office (WFO) forwards a FD-302 regarding interview of [redacted] b6 b7C concerning Half Moon Bay Hotel in Antigua and [redacted]

WFO specifically requests Houston notify WFO CR20 if Houston will not contact [redacted] for further investigation regarding his allegations re SFG and Antigua. This is in light of CR20's relationship with the government witness who initially referred WFO to [redacted]

♦♦

(Rev. 05-01-2008)

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FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 01/17/2010

To: Washington Field

From: Washington Field
Squad CR-20/NVRA
Contact: SA [redacted] b6 b7C b7E

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 58C-WF-240027 10 (Pending)

Title: INTER-AMERICAN ECONOMIC COUNCIL;
STANFORD FINANCIAL GROUP;
CONGRESSMAN [redacted]
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN ET AL;
CEPO-LEGISLATIVE BRANCH
[redacted]

Synopsis: Update to file re captioned matter. Document coordination between Washington Field Office (WFO), Houston Division, and the Department of Justice (Fraud and Public Integrity Sections).

Details: The purpose of this communication is to document CR20's coordination efforts re captioned matter. By way of background, matter was initiated on 04/23/2009 to examine the relationship between Stanford Financial Group (SFG), several Members of Congress and non-profits such at the Inter-American Economic Council (IAEC).

On or about 01/11/2010, writer was telephonically contacted by Houston Supervisory Special Agent (SSA) [redacted] b6 b7C [redacted] SSA [redacted] indicated that Houston received CR20's referral of the interview of [redacted] SSA [redacted] indicated that the EC and enclosed FD302 would be provided to the appropriate [redacted] squad in Houston. SSA [redacted] also indicated that Houston did not initiate a companion PC matter as initially discussed upon instant opening. Writer indicated to Houston that

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01 [redacted] 01 wpd

To: Criminal Investigative From: Washington Field
Re: 58C-WF-240027, 01/17/2010

CR20 would contact [redacted] and inform him that either Houston or DOJ Fraud would contact him in the future. b6 b7C

On 01/13/2010, writer received a communication from Postal Inspector (PI) [redacted] Postal Inspection Service, Washington, DC. PI [redacted] is assigned to the SFG investigation based in the Fraud Section at DOJ. PI [redacted] indicated that Houston Special Agents (SA) [redacted] would obtain the WFO communication and act accordingly. It was noted previously that PI [redacted] believed [redacted] information was valuable to the overall [redacted] investigation.

On 01/15/2010, writer discussed matter with the DOJ-PIN attorney assigned to this investigation. Trial Attorney [redacted]

[redacted] b5 b6 b7C

Writer summarized CR20 investigative efforts for DOJ-PIN as follows:

- [redacted]
- [redacted]
- [redacted]
- [redacted]

[redacted] b3 b7D b7E

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(Rev. 05-01-2008)

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FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 01/31/2010

To: Washington Field

From: Washington Field
Squad CR20/NVRA
Contact: SA [redacted]

Approved By [redacted]

Drafted By: [redacted]

Case ID #: 58C-WF-240027-|| (Pending)

Title: INTER-AMERICAN ECONOMIC COUNCIL;
STANFORD FINANCIAL GROUP;
CONGRESSMAN [redacted]
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN ET AL;
CFPO-LEGISLATIVE BRANCH
[redacted]

b6
b7C
b7E

Synopsis: Document case coordination with Department of Justice-Public Integrity Section (DOJ-PIN) in captioned matter.

Details: Case coordination contacts occurred between writer and Department of Justice-Public Integrity (DOJ-PIN) Trial Attorney [redacted] on 01/27/2010. The purpose of this communication is to document instant discussion in the file.

b3
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b7C

[redacted]

UNCLASSIFIED

03/[redacted]01. wPd)

b6
b7C

To: Washington Field From: Washington Field
Re: 58C-WF-240027, 01/31/2010

[redacted]

b3
b5
b6
b7C

♦♦

(Rev. 05-01-2008)

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/07/2010

To: Houston **Attn:** Squad CR-5
SSA [redacted]

From: Washington Field
Squad CR-20/NVRA
Contact: SA [redacted]

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 58C-WF-240027 12 (Pending)

Title: INTER-AMERICAN ECONOMIC COUNCIL;
STANFORD FINANCIAL GROUP;
CONGRESSMAN [redacted]
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN ET AL;
CFPO-LEGISLATIVE BRANCH
[redacted]

b6
b7C
b7E

GRAND JURY MATERIAL - DISSEMINATE PURSUANT TO RULE 6(e)

Synopsis: Sets forth lead to Houston Division for service of Federal Grand Jury subpoena in captioned matter on Universal Weather and Aviation in Houston, Texas.

Enclosure(s): Enclosed for Houston is one original Grand Jury subpoena for [redacted]

b3
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b7C

Details: The purpose of this communication is to set forth a lead to Houston for service of a Grand Jury subpoena at [redacted]

UNCLASSIFIED

127 [redacted] 01.wpd

[redacted]

b6
b7C

To: Houston From: Washington Field
Re: 58C-WF-240027, 05/07/2010

By way of background, captioned matter was initiated to examine the relationship between Stanford Financial Group (SFG), several Members of Congress already covered by WFO investigation, and the Washington, DC-based non-profit Inter-American Economic Council (IAEC). WFO has since acquired additional materials from IAEC and remains engaged in their analysis.

Captioned matter remains focused on IAEC's relationship with Members and staff, often utilizing SFG as a non-profit funding source for Congressional Delegations (CODELs) to the Caribbean. Most of the trips were in conjunction with the House's Caribbean Caucus. Notably, a number of the Caribbean trips utilized one or more SFG aircraft to transport Capitol Hill staff to destinations. In one remarkable instance, four SFG aircraft were provided by SFG for use by the IAEC with a donation value of $150,000. Additional investigation revealed that SFG may have transported Members and/or staff in other circumstances as well.

[redacted]

It is important to note for Houston that WFO is coordinating with DOJ-PIN/Fraud on WFO's possession of SFG- [redacted] b3 b6 b7C

As such, [redacted] Additionally, any information relevant to any Houston SFG matter will be relayed by WFO to Houston as soon as possible.

Questions regarding this matter can be directed to SA [redacted] Northern Virginia RA, at [redacted] b6 b7C b7E

To: Houston From: Washington Field
Re: 58C-WF-240027, 05/07/2010

LEAD(s):

Set Lead 1: (Action)

HOUSTON

AT HOUSTON, TEXAS

Houston will serve enclosed Federal Grand Jury subpoena for records on [redacted] Attention: [redacted] and return service of same.

b3
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b7C

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(Rev. 05-01-2008)

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 05/17/2010

To: Washington Field **Attn:** NVRA/CR-20
SA [redacted] b6 b7C b7E

From: Houston
CR-5
Contact: SA [redacted]

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 58C-WF-240027-13 (Pending)

Title: INTER-AMERICAN ECONOMIC COUNCIL;
STANFORD FINANCIAL GROUP;
CONGRESSMAN [redacted]
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN ET AL;
CFPO-LEGISLATIVE BRANCH

Synopsis: To provide Return of Service for Grand Jury Subpoena issued to [redacted] b3 b6 b7C

Enclosure(s): An executed Grand Jury Subpoena Return of [redacted]

Details: On May 17, 2010 a Grand Jury Subpoena issued by the United States District Court for the District of Columbia was served on [redacted] Senior Legal Assistant, accepted custody of the subpoena.

UNCLASSIFIED

[redacted] b6 b7C

58C-WF-240027-13

To: Washington Field From: Houston
Re: 58C-WF-240027, 05/17/2010

LEAD(s):

Set Lead 1: (Action)

WASHINGTON FIELD

AT NVRA

Read and clear.

♦♦

A 110 (Rev. 12/89) Subpoena to Testify Before Grand Jury

RETURN OF SERVICE(1)		
RECEIVED BY SERVER	DATE 5-17-10	PLACE Houston, TX
SERVED	DATE 5-17-10	PLACE [redacted]
SERVED ON (PR[redacted]		
SERVED BY (PRINT NAME) [redacted]	TITLE Special Agent, FBI	

STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL

b3
b6
b7C

DECLARATION OF SERVER(2)

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of S[redacted]

Executed on 5/17/10 (Date) [redacted] (Signature of Server)

1 Justice Pkwy, Houst, TX
Address of Server

ADDITIONAL I[redacted]

b6
b7C

X [redacted]
Sr. Legal Assistant
On behalf of [redacted]

(1) As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45©, Federal Rules of Civil Procedure.
(2) "Fees and mileage need not be tendered to the witness upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45©, Federal Rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)".

(Rev. 05-01-2008)

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 06/09/2010

To: Washington Field

From: Washington Field
Squad CR-20/NVRA
Contact: SA [redacted] b6 b7C b7E

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 58C-WF-240027 14 (Pending)

Title: INTER-AMERICAN ECONOMIC COUNCIL;
STANFORD FINANCIAL GROUP;
CONGRESSMAN [redacted]
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN ET AL;
CFPO-LEGISLATIVE BRANCH

Synopsis: Update to file and recommend assignment of CR20 Special Agent (SA) [redacted] as Co-Case Agent on captioned matter.

Details: The purpose of this communication is to document CR20's coordination and investigative efforts re captioned matter and also recommend the assignment of a CR20 Co-Case Agent. By way of background, matter was initiated on 04/23/2009 and has focused on [redacted] past relationship with captioned Members and staff. Matter is also examining Inter-American Economic Council (IAEC) as a non-profit funding mechanism for Congressional Delegation trips. Most of the trips were in conjunction with the House's Caribbean Caucus. b6 b7C

Initial investigative strategy was aimed at examining existing [redacted] materials for information relevant to [redacted] and Stanford Financial Group (SFG). Additionally, the [redacted] b6 b7C b7D b7E

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Assign Co-Case
to SA [redacted]

To: Washington Field From: Washington Field
Re: 58C-WF-240027, 06/09/2010

boxes of materials from IAEC and is currently analyzing their content. CR20 also has access to the SFG online database, utilized by the government in the SFG financial matter, for document review and term searches.

Captioned matter is addressed jointly with Department of Justice's Public Integrity Section (DOJ-PIN) and CR20 coordinates, when required, with the Houston Division squad engaged in the separate SFG financial crimes case. Instant matter was discussed with the assigned DOJ-PIN Trial Attorney as recently as 06/07/2010.

One notable focus of investigation is the proposed interview of [redacted] DOJ-PIN is communicating with [redacted] legal counsel to secure her cooperation. Investigation to date determined SFG correspondence with IAEC was often accomplished through [redacted] especially in topics concerning donation funding. This includes SFG provision of multiple corporate aircraft for IAEC trips on several occasions. b6 b7C

Pursuant to discussions with the CR20 Supervisory Special Agent (SSA), writer recommends assignment of SA [redacted] as Co-Case Agent on captioned matter. SA [redacted] prior [redacted] will be an asset during review of captioned matter materials.

The following investigative areas remain a priority in captioned matter:

- [redacted]
- [redacted]
- [redacted]
- [redacted]

b3 b6 b7C b7D

♦♦

16[redacted]01.wpd

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 07/02/2010

GRAND JURY MATERIAL - DISSEMINATE PURSUANT TO RULE 6(e)

On April 2, 2010, a federal Grand Jury Subpoena (GJS) was issued in the Eastern District of Virginia, Alexandria, Virginia, and served on:

[redacted]

b3
b6
b7C

Investigation on 06/30/2010 at Manassas, VA

File # 58C-WF-240027 15 Date dictated 07/02/2010

by SA [redacted]

b6
b7C

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uwa7210.wpd

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 08/09/2010

GRAND JURY MATERIAL - DISSEMINATE PURSUANT TO RULE 6(e)

The below listed Special Agent (SA) of the FEDERAL BUREAU OF INVESTIGATION (FBI) reviewed the contents of one [redacted]

[redacted]

N3 5/10/10

b3
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b7E

Investigation on 08/09/2010 at Manassas, VA

File # 58C-WF-240027 (6) Date dictated 08/09/2010

by SA [redacted]

b6
b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

[redacted] wpd

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 08/09/2010

GRAND JURY MATERIAL - DISSEMINATE PURSUANT TO RULE 6(e)

The below listed Special Agent (SA) of the FEDERAL BUREAU OF INVESTIGATION (FBI) reviewed the contents of [redacted]

[redacted]

b3
b6
b7C
b7E

Investigation on 08/09/2010 at Manassas, VA

File # 58C-WF-240027 17 Date dictated 08/09/2010

by SA [redacted]

b6
b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

[redacted] wpd

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 08/09/2010

GRAND JURY MATERIAL - DISSEMINATE PURSUANT TO RULE 6(e)

The below listed Special Agent (SA) of the FEDERAL BUREAU OF INVESTIGATION (FBI) reviewed the contents of one [redacted]

[redacted]

b3
b6
b7C
b7E

Investigation on 08/09/2010 at Manassas, VA

File # 58C-WF-240027 18 Date dictated 08/09/2010

by SA [redacted]

b6
b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

[redacted] wpd

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 08/09/2010

GRAND JURY MATERIAL - DISSEMINATE PURSUANT TO RULE 6(e)

The below listed Special Agent (SA) of the FEDERAL BUREAU OF INVESTIGATION (FBI) reviewed the contents of one [redacted]

b3
b6
b7C
b7E

Investigation on 08/09/2010 at Manassas, VA

File # 58C-WF-240027 19 Date dictated 08/09/2010

by SA [redacted]

b6
b7C

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[redacted] wpd

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 08/09/2010

GRAND JURY MATERIAL - DISSEMINATE PURSUANT TO RULE 6(e)

The below listed Special Agent (SA) of the FEDERAL BUREAU OF INVESTIGATION (FBI) reviewed the contents of one [redacted]

[redacted]

b3
b6
b7C

[redacted]

Investigation on 08/09/2010 at Manassas, VA

File # 58C-WF-240027 20 Date dictated 08/09/2010

by SA [redacted]

b6
b7C

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[redacted] wpd

FD-302 (Rev. 10-6-95)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 08/09/2010

GRAND JURY MATERIAL - DISSEMINATE PURSUANT TO RULE 6(e)

The below listed Special Agent (SA) of the FEDERAL BUREAU OF INVESTIGATION (FBI) reviewed the contents of one [redacted]

[redacted]

b3
b6
b7C

Investigation on 08/09/2010 at Manassas, VA

File # 58C-WF-240027 21 Date dictated 08/09/2010

by SA [redacted]

b6
b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

[redacted] wpd

FD-302 (Rev. 10-6-95)

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 08/09/2010

GRAND JURY MATERIAL - DISSEMINATE PURSUANT TO RULE 6(e)

The below listed Special Agent (SA) of the FEDERAL BUREAU OF INVESTIGATION (FBI) reviewed the contents of one [redacted]

[redacted]

b3
b6
b7C

[redacted]

Investigation on 08/09/2010 at Manassas, VA

File # 58C-WF-240027 22 Date dictated 08/09/2010

by SA [redacted]

b6
b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency. [redacted] wpd

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 08/10/2010

[redacted] was contacted via telephone at his office where he is the [redacted] for [redacted] After being advised of the identity of the interviewing Agent and the nature of the interview, [redacted] voluntarily provided the following information:

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[redacted]

Investigation on 08/06/2010 at Manassas, VA (telephonically)

File # 58C-WF-240027 23 Date dictated 08/10/2010

by SA [redacted]

b6
b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

[redacted] 302-wpd

(Rev. 05-01-2008)

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FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 08/31/2010

To: Washington Field

From: Washington Field
Squad CR-20/NVRA
Contact: SA [redacted]

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 58C-WF-240027 (Pending) 24

Title: INTER-AMERICAN ECONOMIC COUNCIL;
STANFORD FINANCIAL GROUP;
CONGRESSMAN [redacted]
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN ET AL;
CFPO-LEGISLATIVE BRANCH
[redacted]

b6
b7C
b7E

Synopsis: Update investigative strategy and document coordination between Washington Field Office (WFO) and Department of Justice, Public Integrity Section (DOJ-PIN).

Details: The purpose of this communication is to update investigative strategy re captioned matter and document CR20's coordination efforts with the Department of Justice (Public Integrity Section). By way of background, matter was initiated on 04/23/2009 to examine the relationship between Stanford Financial Group (SFG), several Members of Congress and non-profits such at the Inter-American Economic Council (IAEC).

To date, CR20 has completed examination and analysis of [redacted] b3
the latter provided logistical services for five of six Stanford Financial Group (SFG) corporate aircraft. CR20 has also completed examination of relevant travel and financial disclosures for involved Congressional Members and staff. No remarkable discrepancies have been noted in the materials to suggest

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To: Criminal Investigative From: Washington Field
Re: 58C-WF-240027, 08/31/2010

[redacted]

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On 08/25/2010, writer and CR20 SA [redacted] met with the DOJ-PIN Trial Attorney [redacted] It was agreed DOJ-PIN

[redacted]

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24[redacted]01.wpd

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 09/07/2010

GRAND JURY MATERIAL - DISSEMINATE PURSUANT TO RULE 6(e)

[redacted] was contacted via telephone at the office of [redacted] (previously interviewed), who was also on the phone representing [redacted] office phone number [redacted] Also present on the phone was [redacted] paralegal for [redacted] After being advised of the identity of the interviewing Agent and the nature of the interview, [redacted] voluntarily provided the following information:

b6
b7C

N3 9/14/10

[redacted]

b3
b6
b7C

Investigation on 08/30/2010 at Manassas, VA (telephonically)

File # 58C-WF-240027 25 Date dictated 09/03/2010

by [redacted]

b6
b7C

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

[redacted] wpd

(Rev. 05-01-2008)

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FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/08/2010

To: Washington Field

From: Washington Field
Squad CR-20/NVRA
Contact: SA [redacted]

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 58C-WF-240027 (Pending)

Title: INTER-AMERICAN ECONOMIC COUNCIL;
STANFORD FINANCIAL GROUP;
CONGRESSMAN [redacted]
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN ET AL;
CFPO-LEGISLATIVE BRANCH
[redacted]

b6
b7C
b7E

Synopsis: Update investigative strategy and document coordination between Washington Field Office (WFO) and Department of Justice, Public Integrity Section (DOJ-PIN).

Details: The purpose of this communication is to update investigative strategy re captioned matter and document CR20's coordination efforts with the Department of Justice, Public Integrity Section.

To date, CR20 has completed examination and analysis of [redacted]

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(Rev. 05-01-2008)

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FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 10/28/2010

To: Washington Field

From: Washington Field
Squad CR-20/NVRA
Contact: SA [redacted]

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 58C-WF-240027 28 (Pending) [redacted] b6 b7C b7E

Title: INTER-AMERICAN ECONOMIC COUNCIL;
STANFORD FINANCIAL GROUP;
CONGRESSMAN [redacted]
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN
CONGRESSMAN ET AL;
CFPO-LEGISLATIVE BRANCH
[redacted]

Synopsis: Update to file and document coordination between Washington Field Office (WFO) and Department of Justice, Public Integrity Section (DOJ-PIN).

Details: The purpose of this communication is to update the investigative status of captioned matter and document CR20's coordination with the Department of Justice, Public Integrity Section (DOJ-PIN). This includes documentation of DOJ-PIN's verbal declination of captioned matter on 10/26/2010.

On 10/26/2010, CR20 agents and DOJ-PIN Trial Attorney (TA) [redacted] interviewed [redacted] b6 b7C of Washington-based Inter-American Economic Council (IAEC). The IAEC was the non-profit organization which served as the pass-through for Stanford Financial Group (SFG) funded events for Members of Congress and staff from about 2002 onward. The interview was conducted at the law offices of DLA Piper and [redacted] was represented by a DLA Piper attorney. In essence, the interviewed failed to disclose significant information that could be used in any federal

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To: Criminal Investigative From: Washington Field
Re: 58C-WF-240027, 10/28/2010

prosecution but did provide additional information and background on the creation and funding of the Congressional trips of interest to this investigation.

Immediately after the interview, CR20 Case Agents and TA discussed captioned matter. TA

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Current 1B evidence in captioned matter is in the temporary possession of DOJ Fraud for discovery in the main SFG financial prosecution. Those materials are expected to be returned to WFO in several weeks. In light of DOJ-PIN's declination, writer will begin preparation of case closing materials for captioned matter and CR20 will cease active investigation in this case.

♦♦
30 101.wpd

(Rev. 05-01-2008)

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 11/03/2010

To: Washington Field

From: Washington Field
Squad CR-20/NVRA
Contact: SA [redacted] b6 b7C b7E

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 58C-WF-240027 (Pending) 29

Title: INTER-AMERICAN ECONOMIC COUNCIL;
STANFORD FINANCIAL GROUP;
CONGRESSMAN [redacted] ET AL
CFPO-LEGISLATIVE BRANCH
[redacted]

N3 11/3/10

Synopsis: To document a database check in www.opensecrets.org for Congressional campaign contributions from [redacted]

Enclosure(s): 1) One-page document from www.opensecrets.org listing records of Congressional campaign contributions from [redacted] dated 11/03/2010. b6 b7C
2) Four-page document from www.opensecrets.org listing records of Congressional campaign contributions from [redacted] dated 11/03/2010.
3) Three-page document from www.opensecrets.org listing records of Congressional campaign contributions from Stanford Financial Group, dated 11/03/2010.

Details: For information of the file, on 11/03/2010, public source database searches were conducted using the website www.opensecrets.org. The purpose of the searches was to identify Congressional campaign contributions given by [redacted] from 2000 through 2010. The www.opensecrets.org database was searched for contributions from donors named [redacted] and "Stanford Financial Group." The search identified 103 Congressional contributions totaling $1,657,146.

♦♦

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opsec EC.wpd

OpenSecrets.org
Center for Responsive Politics

Results:

Search Criteria:
Donor name: [redacted]
Donor State: TX
Cycle(s) selected: All
Start another search

Sort by Name
Sort by Date (Descending)
Sort by Amount

Sort

5 records found in 0.140 seconds.
Total for this search: $8,200

1

Contributor	Occupation	Date	Amount	Recipient
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP CO./CEO	12/2/05	$2,100	
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP CO./CEO	12/2/05	$2,100	
[redacted] DALLAS,TX 75217	STANFORD FINANCIAL/CEO	9/28/04	$2,000	
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP	9/28/00	$1,000	
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL	5/29/01	$1,000	

b6
b7C

1

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OpenSecrets.org
Center for Responsive Politics

Results:

Search Criteria:
Donor name: stanford financial
Donor State: TX
Cycle(s) selected: All
Start another search

Sort by Name
Sort by Date (Descending)
Sort by Amount

Sort

36 records found in 0.188 seconds.
Total for this search: $783,345

1

Contributor	Occupation	Date	Amount	Recipient
STANFORD FINANCIAL G DALLAS,TX 75201		2/19/09	$-14,000	Shelby, Richard C (R)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056		6/23/00	$100,000	RNC/Repub National State Elections Cmte (R)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056	N/A	3/29/02	$50,000	DCCC/Non-Federal Account 1 (D)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056	N/A	10/21/02	$50,000	DCCC/Non-Federal Account 1 (D)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056	N/A	9/10/02	$25,000	DCCC/Non-Federal Account 1 (D)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056	INFO REQUESTED	3/13/02	$25,000	NRCC/Non-Federal (R)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056		4/6/01	$25,000	NRCC/Non-Federal (R)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056		8/28/00	$20,000	NRSC/Non-Federal (R)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056		8/30/00	$20,000	NRSC/Non-Federal (R)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056	N/A	10/23/01	$20,000	DCCC/Non-Federal Account 1 (D)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056		6/21/01	$20,000	NRSC/Non-Federal (R)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056		6/25/01	$20,000	NRSC/Non-Federal (R)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056		6/22/00	$15,000	DSCC/Non-Federal Corporate (D)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056		9/29/00	$10,000	DSCC/Non-Federal Corporate (D)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056		5/8/01	$10,000	DCCC/Non-Federal Account 1 (D)
STANFORD FINANCIAL GROUP CO		3/26/01	$10,000	DCCC/Non-Federal Account 1 (D)

HOUSTON,TX 77056				
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056		8/4/00	$5,000	DCCC/Non-Federal Account 1 (D)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056		7/18/00	$5,000	DSCC/Non-Federal Corporate (D)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056		7/21/00	$3,500	RNC/Repub National State Elections Cmte (R)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056		1/23/01	$800	NRSC/Non-Federal (R)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056		4/9/01	$550	NRSC/Non-Federal (R)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056		8/16/01	$400	NRSC/Non-Federal (R)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056		6/11/01	$275	NRSC/Non-Federal (R)
STANFORD FINANCIAL GROUP CO HOUSTON,TX 77056		9/12/00	$250	NRSC/Non-Federal (R)
STANFORD FINANCIAL GROUP COMPANY HOUSTON,TX 77056		3/14/02	$100,000	DSCC/Non-Federal Corporate (D)
STANFORD FINANCIAL GROUP COMPANY HOUSTON,TX 77056		8/15/02	$100,000	DSCC/Non-Federal Corporate (D)
STANFORD FINANCIAL GROUP COMPANY HOUSTON,TX 77056	INFO REQUESTED	11/4/02	$50,000	NRCC/Non-Federal (R)
STANFORD FINANCIAL GROUP COMPANY HOUSTON,TX 77056		12/28/01	$50,000	DSCC/Non-Federal Corporate (D)
STANFORD FINANCIAL GROUP COMPANY HOUSTON,TX 77056		6/27/01	$25,000	DSCC/Non-Federal Corporate (D)
STANFORD FINANCIAL GROUP COMPANY HOUSTON,TX 77056		3/29/01	$12,500	DSCC/Non-Federal Corporate (D)
STANFORD FINANCIAL GROUP COMPANY HOUSTON,TX 77056		3/29/01	$12,500	DSCC/Non-Federal Corporate (D)
STANFORD FINANCIAL GROUP COMPANY HOUSTON,TX 77056		12/19/00	$10,000	DSCC/Non-Federal Corporate (D)
STANFORD FINANCIAL GROUP COMPANY HOUSTON,TX 77056		8/9/02	$500	DSCC/Non-Federal Corporate (D)
STANFORD FINANCIAL GROUP COMPANY HOUSTON,TX 77056		4/11/02	$400	NRSC/Non-Federal (R)
STANFORD FINANCIAL GROUP COMPANY HOUSTON,TX 77056		7/10/02	$335	NRSC/Non-Federal (R)
STANFORD FINANCIAL GROUP COMPANY HOUSTON,TX 77056		3/28/02	$335	NRSC/Non-Federal (R)

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Contributor	Occupation	Date	Amount	Recipient
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP	9/22/00	$1,000	[redacted]
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP/PRESIDENT	10/20/03	$2,500	National Leadership PAC (D)
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP/CHAIRMAN &	10/27/06	$2,100	[redacted]
[redacted] HOUSTON,TX 77074	STANFORD FINANCIAL/CEO	11/1/04	$2,000	
[redacted] HOUSTON,TX 77074	INFORMATION REQUEST PENDING	6/25/01	$1,000	
[redacted] HOUSTON,TX 77056		2/19/09	$-2,000	
[redacted]MR HOUSTON,TX 77056	STANFORD FINANCIAL GROUP CO./CHAIRM	3/2/04	$25,000	Republican National Cmte (R)
[redacted]MR HOUSTON,TX 77056	STANFORD FINANCIAL GROUP/CHAIRMAN	9/22/04	$5,000	National Republican Congressional Cmte (R)
[redacted]MR HOUSTON,TX 77056	STANFORD FINANCIAL GROUP/CHAIRMAN	4/8/05	$5,000	National Republican Congressional Cmte (R)
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP CO	10/9/02	$250,000	DSCC/Non-Federal Unicorp Assoc (D)
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP CO	11/1/02	$250,000	DSCC/Non-Federal Unicorp Assoc (D)
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP CO	11/5/02	$50,000	DSCC/Non-Federal Individual 2 (D)
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP CO	7/20/05	$25,000	Democratic Senatorial Campaign Cmte (D)
[redacted]		2/17/00	$20,000	DCCC/Non-Federal Account 5

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HOUSTON,TX 77056				(D)
HOUSTON,TX 77056	STANFORD FINANCIAL GROUP CO	6/30/04	$10,000	Democratic Senatorial Campaign Cmte (D)
HOUSTON,TX 77056	STANFORD FINANCIAL GROUP CO	6/30/03	$10,000	Democratic Senatorial Campaign Cmte (D)
HOUSTON,TX 77056	STANFORD FINANCIAL GROUP CO	7/17/00	$10,000	Democratic Senatorial Campaign Cmte (D)
HOUSTON,TX 77056	STANFORD FINANCIAL GROUP	5/17/00	$5,000	Americans for a Republican Majority (R)
HOUSTON,TX 77056	STANFORD FINANCIAL GROUP/PRESIDENT	6/30/01	$5,000	KPAC (R)
HOUSTON,TX 77056	STANFORD FINANCIAL GROUP/PRESIDENT	8/1/01	$5,000	Lone Star Fund (D)
Houston,TX 77046	Stanford Financial	5/30/08	$2,300	
HOUSTON,TX 77056	STANFORD FINANCIAL/CHAIRMAN & CEO	7/20/06	$2,100	
HOUSTON,TX 77056	STANFORD FINANCAL GROUP/CHAIRMAN	11/2/06	$2,000	
HOUSTON,TX 77056		6/18/07	$2,000	
HOUSTON,TX 77056		7/1/03	$2,000	
HOUSTON,TX 77074	STANFORD FINANCIAL GROUP/CHAIRMAN &	2/3/04	$2,000	
HOUSTON,TX 77074	STANFORD FINANCIAL GROUP	4/4/04	$2,000	
HOUSTON,TX 77056		6/18/07	$1,700	
Houston,TX 77056	Stanford Financial	8/20/08	$1,000	
HOUSTON,TX 77056	STANFORD FINANCIAL GROUP	7/2/03	$1,000	
HOUSTON,TX 77056	STANFORD FINANCIAL GROUP	7/2/03	$1,000	
HOUSTON,TX 77056	STANFORD FINANCIAL GROUP	7/25/03	$1,000	
	STANFORD FINANCIAL GROUP	7/25/03	$1,000	

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HOUSTON,TX 77056				
[redacted] HOUSTON,TX 77056	STANFORD FINAN GROUP	2/25/00	$1,000	
[redacted] HOUSTON,TX 77056	STANFORD FINAN GROUP	2/25/00	$1,000	
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL	2/4/00	$1,000	
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL	2/4/00	$1,000	
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL	7/12/00	$1,000	
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP	8/22/00	$1,000	
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP	8/9/00	$1,000	
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP/CEO	11/5/02	$1,000	
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP/CHAIRMAN &	5/3/02	$1,000	b6 b7C
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP	4/2/01	$1,000	
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP	4/18/01	$1,000	
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP	5/7/01	$1,000	
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP	5/23/02	$1,000	
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP	5/31/02	$1,000	
[redacted] HOUSTON,TX 77056	STANFORD FINANCIAL GROUP	5/31/02	$1,000	
[redacted] HOUSTON,TX 77056		10/1/01	$-1,000	
[redacted] HOUSTON,TX 77056		8/28/02	$-1,000	

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 10/27/2010

[redacted] was interviewed at the law offices of DLA PIPER 500 Eighth Street, Northwest, Washington, DC 20004. Also present for the interview was DLA PIPER attorney [redacted] business telephone number [redacted] business e-mail address [redacted] representing the INTER-AMERICAN ECONOMIC COUNCIL and DEPARTMENT OF JUSTICE, PUBLIC INTEGRITY SECTION attorney [redacted] business address 1400 New York Avenue Northwest, Washington, DC 20530, business telephone number [redacted] After being advised as to the identities of the interviewing Agents and the nature of the interview, [redacted] voluntarily provided the following information:

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[redacted]

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Investigation on 10/26/2010 at Washington, DC

File # 58C-WF-240027 30 Date dictated 10/27/2010

by [redacted]

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[redacted]302.wpd

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(Rev. 05-01-2008)

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 02/08/2011

To: Houston **Attn:** Evidence Control
SA [redacted]

Washington Field **Attn:** Evidence Control

From: Washington Field
CR20 - NVRA
Contact: SA [redacted]

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 58C-WF-240027 31 (Pending)
318B-HO-68445 232 (Pending)

Title: INTER-AMERICAN ECONOMIC COUNCIL;
STANFORD FINANCIAL GROUP, ET AL;
CFPO-LEGISLATIVE BRANCH
[redacted]

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GRAND JURY MATERIAL - DISSEMINATE PURSUANT TO RULE 6(e)

Synopsis: [redacted] to Houston Division for consolidation into Houston matter 318B-HO-68445. [redacted] in captioned matter.

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Administrative: Reference is made to 02/07/2011 electronic mail (e-mail) between SA [redacted] Houston, and SA [redacted] Washington Field.

Package Copy: Being forwarded under separate cover are seven boxes of records, representing 1B items 1B1 through 1B6 under 58C-WF-240027.

Details: The purpose of this communication is to transmit seven (7) boxes of document evidence to Houston Division for consolidation into Houston matter 318B-HO-68445. This transfer consists of all 1B evidence in captioned Washington Field Office (WFO) case 58C-WF-240027. Captioned WFO matter is being prepared for closure after prosecution declination from Department of Justice, Public Integrity Section (DOJ-PIN).

UNCLASSIFIED

(Rev. 05-01-2008)

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE **Date:** 03/08/2011

To: Criminal Investigative **Attn:** Public Corruption Unit
Room 3975

From: Washington Field
CR-20/NVRA
Contact: SA [redacted] b6 b7C b7E

Approved By: [redacted]

Drafted By: [redacted]

Case ID #: 58C-WF-240027 (Pending)

Title: INTER-AMERICAN ECONOMIC COUNCIL;
STANFORD FINANCIAL GROUP;
CONGRESSMAN [redacted] ET AL;
CFPO-LEGISLATIVE BRANCH
[redacted]

Synopsis: To request closure of captioned full-field public corruption investigation and to advise FBI Headquarters (FBIHQ), Public Corruption Unit (PCU) of same through provision of attached Letterhead Memorandum (LHM).

Full-Field Investigation Initiated: 04/23/2009

Enclosure(s): For FBIHQ PCU is one original and one copy of closing LHM for captioned matter.

Details: Captioned matter was initiated by the Washington Field Office (WFO) to address allegations of unlawful provision of things-of-value (TOVs) to current and former Members of Congress by Stanford Financial Group (SFG) through the non-profit Inter-American Economic Council (IAEC). These allegations came to the attention of WFO as a result of the FBI and Securities and Exchange Commission (SEC) investigation of [redacted] b6 b7C

UNCLASSIFIED

Close Case and all Subfiles 3/14/11
C-5
[redacted]

067[redacted]01.wpd

and SFG. There has been, and continues to be, substantial media coverage of the SFG financial crimes matter based in the Houston Division and supported by the Department of Justice Fraud Section (DOJ-Fraud).

The public corruption allegations primarily revolved around Congressional trips, provided through IAEC and funded by SFG, that occurred prior to passage of the Honest Leadership Open Government Act (HLOGA) of 2007. HLOGA substantially amended lobby disclosure requirements and effectively closed the loop on the use of non-profit entities, such as IAEC, as easy pass-through mechanisms for corporate giving to Members of Congress and staff. Specifically, WFO investigation

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In response to published media reports that connected SFG to Capitol Hill, WFO initiated a review of emerging open source material and information gathered during WFO's

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association with the IAEC was a central issue in the captioned investigation. The IAEC is a District of Columbia-based non-profit corporation, established in 1999, to "provide senior Government officials, leading business executives, and academic professionals the opportunity to engage in a dialogue about current and future economic strategies in the hemisphere". Additionally, this investigation

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According to open source reporting and subsequent WFO investigation, IAEC regularly sponsored trips for U.S. lawmakers to the Carribean. was known for extensive Carribean business interests, including Stanford International Bank

headquartered in Antigua. It was reasonable to assume that the support of key Members of U.S. Congress, as well as that of the Congressional CC, was of great importance to [redacted] business interests.

During investigation, WFO examined [redacted]

[redacted]

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WFO completed examination of [redacted]

[redacted]

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[redacted]

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To: Criminal Investigative From: Washington Field
Re: 58C-WF-240027, 03/08/2011

[redacted] b6 b7C b7D

WFO interviewed [redacted]. In essence, the interview failed to disclose any significant information that could be used in a federal prosecution. [redacted] b6 b7C

Department of Justice Opinion

[redacted] b5 b6 b7C

To: Criminal Investigative From: Washington Field
Re: 58C-WF-240027, 03/08/2011

Set Lead 1: (Action)

CRIMINAL INVESTIGATIVE

AT WASHINGTON, DC

Public Corruption Unit (PCU) will disseminate enclosed Letterhead Memorandum (LHM) as required.

♦♦

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No. 58C-WF-240027 34

Manassas, Virginia
March 8, 2011

INTER-AMERICAN ECONOMIC COUNCIL;
STANFORD FINANCIAL GROUP;
CONGRESSMAN [redacted]
CONGRESSMAN [redacted]
CONGRESSMAN [redacted]
CONGRESSMAN
CONGRESSMAN
CEPO-LEGISLATIVE BRANCH
[redacted]

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Captioned matter was initiated by the Washington Field Office (WFO) to address allegations of unlawful provision of things-of-value (TOVs) to current and former Members of Congress by Stanford Financial Group (SFG) by utilizing the Inter-American Economic Council (IAEC). The IAEC is a District of Columbia-based non-profit corporation, established in 1999, to "provide senior Government officials, leading business executives, and academic professionals the opportunity to engage in a dialogue about current and future economic strategies in the hemisphere". These allegations came to the attention of WFO as a result of the FBI and Securities and Exchange Commission (SEC) financial crimes investigation of [redacted] and SFG.

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[redacted] association with the IAEC was the central focus of the investigation. Additionally, this investigation

[redacted]

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This investigation included review of emerging open source material and information gathered during other WFO public corruption investigations. WFO [redacted]

[redacted]

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067 [redacted] 02. wpd

[redacted]

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WFO investigation also included access and review of investigative product from the financial crimes matter in Texas. This document collection [redacted] and other correspondence. None of the materials reviewed provided tangible evidence of corrupt activity directly related to IAEC and the Carribean Caucus.

[redacted]

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Department of Justice Opinion

[redacted]

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